

1 Paul J. Cambria, Jr. (NY 15873, admitted *pro hac vice*)  
2 Erin E. McCampbell (NY 4480166, admitted *pro hac vice*)  
LIPSITZ GREEN SCIME CAMBRIA LLP  
3 42 Delaware Avenue, Suite 120  
4 Buffalo, New York 14202  
Telephone: (716) 849-1333  
5 Facsimile: (716) 855-1580  
6 pcambria@lglaw.com  
emccampbell@lglaw.com  
7 Attorneys for Defendant Michael Lacey

8  
9 IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

10  
11 United States of America,

12 Plaintiff,

13 vs.

14 Michael Lacey, *et al.*,

15 Defendants.  
16

NO. CR-18-00422-PHX-SMB

**NOTICE OF ERRATA TO MOTION TO  
SUPPRESS, FILED OCTOBER 18, 2019  
(Doc. 778)**

17  
18  
19  
20 Movant Michael Lacey, by and through his undersigned counsel, hereby files this Notice  
21 of Errata. On October 18, 2019, Michael Lacey filed, among other things, a *Motion to Suppress*.  
22 (Doc. 778.) After submitting to the Court, undersigned counsel identified that the motion  
23 inadvertently did not include appropriate attachments for Exhibit E and Exhibit F.

24 Attached hereto as Exhibit 1 is Exhibit E to the *Motion to Suppress*.

25 Attached hereto as Exhibit 2 is Exhibit F to the *Motion to Suppress*.  
26  
27  
28

1  
2 DATED: November 11, 2019

Erin E. McCampbell  
Paul J. Cambria, Jr.  
LIPSITZ GREEN SCIME CAMBRIA LLP

3  
4 By: /s/ Erin E. McCampbell  
5 Erin E. McCampbell  
6 Paul J. Cambria, Jr.  
7 Attorneys for Michael Lacey  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 On November 11, 2019, a PDF version  
2 of this document was filed with  
3 Clerk of the Court using the CM/ECF  
4 System for filing and for Transmittal  
5 Of a Notice of Electronic Filing to the  
6 Following CM/ECF registrants:

7 Kevin Rapp, kevin.rapp@usdoj.gov  
8 Reginald Jones, reginald.jones4@usdoj.gov  
9 Peter Kozinets, peter.kozinets@usdoj.gov  
10 John Kucera, john.kucera@usdoj.gov  
11 Margaret Perlmeter, margaret.perlmeter@usdoj.gov  
12 Patrick Reid, Patrick.Reid@usdoj.gov  
13 Andrew Stone, andrew.stone@usdoj.gov  
14 Amanda Wick, Amanda.Wick@usdoj.gov  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **EXHIBIT 1**



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 09/05/2018

The following search warrants, issued by United States Magistrate Judge John Z. Boyle in the United States District Court for the District of Arizona on August 31, 2018, were executed as indicated below:

1. Search warrant for five (5) servers located at the Federal Bureau of Investigation's Evidence Control Room, 21711 N. 7th Street, Phoenix, Arizona, 85024, on September 4, 2018:

- a. Server S/N: GLF4ND2 - 1B(34);
- b. Server S/N: 1650N8N10100 - 1B(35);
- c. Server S/N: C8260FF22N20190 - 1B(36);
- d. Server S/N: 7Q32GK2 - 1B(37);
- e. Server S/N 4JJAAD2 - 1B(72).

2. Search warrant for the digital devices seized from Michael Lacey and James Larkin located at the Federal Bureau of Investigation's Evidence Control Room, 21711 N. 7th Street, Phoenix, Arizona, 85024, on September 4, 2018:

Michael Lacey from 3300 E. Stella Lane, Paradise Valley, Arizona

- a. Microsoft Surface Laptop, Serial: 038796281653 - 1B(103);
- b. Dell All in One Computer, Serial: C2KR922 - 1B(104);
- c. Orange Nikon Coolpix, Serial: 31001848 - 1B(112);
- d. HP All in One Computer, Serial: 4CS413096G - 1B(129);
- e. One (1) DVD disk containing image set and examination report for Apple iPhone 356698088226734 imaged onsite - 1B(22).

Michael Lacey from 10647 North State Route 89A, Sedona, Arizona

Investigation on 08/31/2018 at Phoenix, Arizona, United States (In Person, Email)

File # 50A-PX-9247052

Date drafted 09/04/2018

by TOLHURST DESIRAE K

50A-PX-9247052

Continuation of FD-302 of (U) Search Warrants, On 08/31/2018, Page 2 of 4

- a. HP Laptop, Serial: 5CD75064KN - 1B(12);
  - b. HP Pavilion 20 All In One PC, Model: 20-b014, Serial: 3CR323056M - 1B(10);
- James Larkin from 5555 North Casa Blanca Drive, Paradise Valley, Arizona
- a. (3) DVDs - 1B(92);
  - b. Mac Laptop, Serial: W80087M98PW - 1B(91);
  - c. Apple Computer Monitor, Serial: C02550LEF2GC - 1B(87);
  - d. Apple Laptop, Model: A1398, Serial: C02J93XLDKQ4 - 1B(86);
  - e. Black My Passport Ultra hard drive, Serial: WXT1EA5AAZJT - 1B(85);
  - f. Seagate hard drive, Serial: NA0QBG56 - 1B(84);
  - g. White Apple Time Capsule, Serial, Serial: 6F9450KKACD - 1B(79);
  - h. Apple Laptop, Serial: C1MR82XDG942 - 1B(76);
  - i. Silver iPad Mini - 1B(75);

Devices from James Larkin

- a. Apple Laptop, Model: A1466, Serial: C1MTD0B1H569 - 1B(28);
- b. iPhone cellular phone Model: A1784, FCC ID: BCG-E3092A - 1B(27).

3. Search warrant for the following Backpage related account information stored at a premises owned, controlled, maintained, or operated by Datto, Inc., a company headquartered at 101 Merritt 7, Norwalk, Connecticut, 06851, on September 4, 2018 via email to scash@daypitney.com and satwardy@daypitney.com, attorneys for Datto, Inc.:

- a. joye@backpage.com
- b. joye@postfaster.com
- c. dan@backpage.com
- d. dan@websitetechnologies.com
- e. andrew@backpage.com

50A-PX-9247052

Continuation of FD-302 of (U) Search Warrants, On 08/31/2018, Page 3 of 4

f. andrew@postfaster.com  
g. carl@postsol.com  
h. carl.ferrer@backpage.com  
i. carl@adtechbv.com  
j. michael@postsol.com  
k. michaelg@postsol. com  
l. michael@adtechbv.com  
m. michael@websitetechnologies .com  
n. stefanie@postsol.com  
o. stefaniep@websitetechnologies.com  
p. issa@backpage.com  
q. nathan@backpage.com  
r. tamara@backpage.com  
s. stefan@postsol.com  
t. stefan@websitetechnologies.com  
u. bailey@postsol.com  
v. ncmecc@backpage .com  
w. omar@universads.nl  
x. omar@easvpostl23.com  
y. julia@guliettagroup.nl  
z. juliad@mobileposting.com

A copy of the aforementioned search warrants are attached and made a part hereto.

50A-PX-9247052

Continuation of FD-302 of (U) Search Warrants, On 08/31/2018, Page 4 of 4



## **EXHIBIT 2**

Erin McCampbell Paris

**Sent:** Friday, October 11, 2019 9:42 AM  
**To:** Kevin.Rapp@usdoj.com; Margaret.perlmeter@usdoj.gov; reginald.jones4@usdoj.gov; Peter.Kozinets@usdoj.gov; andrew.stone@usdoj.gov  
**Cc:** Paul Cambria  
**Attachments:** 9.5.18 FD 302 Form.pdf (180 KB)

Hi Kevin,

I have attached an FD 302 form dated September 5, 2018 that references (at Point 3) a search warrant for email that was sought in the District of Arizona in connection with this case. We do not have a copy of this search warrant or the search warrant application and neither does counsel for other defendants. Please send us a copy of the search warrant and warrant application, or, if we already have it, please give us the Bates Numbers associated with those documents so we can locate them within the discovery.

Thank you.

Best wishes,

Erin



**Erin McCampbell Paris**

Attorney at Law

42 Delaware Ave | Suite 120 | Buffalo, NY 14202

TEL 716 849 1333 x323 | FAX 716 855 1580

[email](#) | [profile](#) | [website](#) | [map](#) | [vCard](#)

---

**NOTICE:** This message contains privileged and confidential information intended only for the use of the persons named above. If you are not the intended recipient, you are hereby notified that any distribution or copying of this message is prohibited.